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20 Attorneys for Defendants SELDAT, INC.
21 and SELDAT DISTRIBUTION, INC.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

DOMENICO D'CARPIO, Individually
and on Behalf of all Others Similarly
Situated.,

Plaintiffs,

vs.

SELDAT, INC., and SELDAT
DISTRIBUTION, INC.

Defendants.

Case No. 2:19-cv-00174-JLS-RAO

**JOINT STIPULATION TO
EXTEND DEFENDANTS' TIME
TO RESPOND TO THE FIRST
AMENDED COMPLAINT**

Honorable Josephine L. Staton

COMES NOW plaintiff Domenico D'Carpio ("Plaintiff") and defendants Seldat, Inc., and Seldat Distribution, Inc., (collectively "Defendants") and stipulate with reference to the following:

///

1 A. Defendants substituted Wolf, Rifkin, Shapiro, Schulman & Rabkin,
2 LLP, as counsel of record in this action by Order entered July 29, 2019 (Dkt. 27).

3 B. Defendants will shortly seek to associate in as counsel of record
4 Robinson Brog Leinwand Greene Genovese & Gluck P.C., and Michael E.
5 Eisenberg.

6 C. Defendants will also seek have Mr. Eisenberg and Robinson Brog
7 Leinwand Greene Genovese & Gluck P.C. , admitted to practice before this District
8 Court *pro hac vice*.

9 Therefore, Plaintiff and Defendants now:

10 **STIPULATE AND AGREED**, between the undersigned counsel, that the
11 time for defendants Seldat, Inc. and Seldat Distribution, Inc. (“Defendants”) to
12 answer or otherwise respond with respect to the First Amended Complaint in the
13 above-captioned action is extended through and including August 30, 2019.

14 **FURTHER STIPULATE AND AGREED**, by and between the undersigned
15 counsel that Defendants hereby waive any and all defenses as to personal
16 jurisdiction including any defense based upon service of the Summons and
17 Complaint.

18 **FURTHER STIPULATE AND AGREED** that the statute of limitations on
19 claims set forth in the FAC are tolled for period of time beginning on July 30, 2019
20 and ending when Defendants have responded to the FAC.

21 **FURTHER STIPULATE AND AGREED**, this stipulation may be executed
22 by facsimile signatures, which shall be deemed original signatures.

23 DATED: August 1, 2019

GLANCY PRONGAY & MURRAY LLP

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By: /s/ Kevin F. Ruf

KEVIN F. RUF

Attorneys for Plaintiffs

1 DATED: August 1, 2019

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5 WOLF, RIFKIN, SHAPIRO,
6 SCHULMAN & RABKIN, LLP
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By: /s/ Simon Aron

SIMON ARON

Attorneys for Defendants Seldat, Inc. and Seldat
Distribution, Inc.

1 **FILER'S ATTESTATION**

2 Pursuant to L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories
3 listed above, and on whose behalf the filing is submitted, concur in the filing's
4 content and have authorized the filing.

5 DATED: August 1, 2019

6 WOLF, RIFKIN, SHAPIRO,
7 SCHULMAN & RABKIN, LLP

8 By: /s/ Simon Aron

9 SIMON ARON

10 Attorneys for Defendants Seldat, Inc. and Seldat
11 Distribution, Inc.

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